Kansas Department of Health and Environment
Bureau of Air and Radiation
Air Engineering Section

Subject: Standard Operating Procedure (SOP) for Reviewing and Evaluating Excess Emission Reports (EER's) & Source Information Reports.

Purpose: This SOP outlines the procedure for reviewing and evaluating Excess Emission Reports (EER's) and other reports submitted by the source owner/operator. The EER's contain data obtained from Continuous Emission Monitoring Systems (CEM's). Source Information Reports (SIR) are required because of permit conditions or restrictions in operations imposed by a permit issued by the department. These reports are submitted by the sources on a quarterly basis to the department.

Applicability: Certain sources are required to install and operate CEMS under:

1) K.A.R. 28-19-14. Permits Required;

2) K.A.R. 28-19-16. New Source Permit Requirement for designated non-attainment areas

3) K.A.R. 28-19-17. New Source Permit Requirement for designated attainment and unclassified areas;

4) K.A.R. 28-19-19. Continuous Emission Monitoring

5) K.A.R. 28-19-93. Monitoring Requirement;

6) Title IV - 1990 Clean Air Act Amendments. Proposed 40 CFR Part 75 Continuous Emissions Monitoring.

Data Management:

1. Excess Emission Reports (EER's) and Source Information Reports (SIR) are reviewed and evaluated in a consistent matter.

2. The results of these evaluations, including recommendations for further action will be summarized by a memorandum and forwarded to the Air Inspections and Enforcement Section within 30 days of receipt of the report.

Review Procedure:

1. Examine Emission Reports: All EER's and SIR's will be logged in by the Air Engineering staff and prepared for entry into the Aerometric Information Retrieval System (AIRS)

2. Reports Submittal: Reports are due within 30 days after the end of each calendar quarter (January 30, April 30, July 30, October 30). The owner/operator will have an additional 15 days grace period to submit the delinquent report. If the source has still failed to submit the reports, the Air Engineering Section will remind the source that the report is past due. The Air Inspections and Enforcement Section will be informed by a memorandum for further action if the required report has not been received within two weeks after notifying the source.

3. Data Review: The Air Engineering staff completes a separate analysis of each emission point and pollutant listed in the detailed report. This policy does not use the CEMS data as an emission compliance method, but is used for further investigation once the percent is exceeded. If the percent criteria is more than recommended in the formulas, acquisition of more data is requested and further investigation is conducted before notifying the Air Inspections and Enforcement Section.

4. Failure to submit reports: A memorandum is written from the Air Engineering Section to the Air Inspections and Enforcement Section if a source fails to send in a report. Following items will be included in the memorandum:

   A. Source name and permit number
   B. Applicable regulation, permit, or approval date requiring the submittal
   C. The pollutant(s) of concern
   D. The due date of the report and the reporting period is covered.
   E. A copy of the reminder letter.
   F. The fact that there has been no response to the reminder letter.

6. Malfunction Data:

   If the number of malfunctions are over 5% of the total time in the quarter, the Air Engineering Section will notify the Air Inspections and Enforcement Section with a memorandum.

   Formula: $\frac{\text{(LT in Violation)}}{\text{(LT of operation)}} \times 100\% = \text{(must be less than 5\%)}$

   LT = Length of time

Note: Many malfunctions are exempt from K.A.R. 28-19-11 and may not count toward total time. These should be dealt on an individual plant basis.

7. Excess Emissions Data:

If the excess emissions are over 5% of the total time in the quarter, the Air Inspections and Enforcement Section will be notified by a memo for further action.

Formula: $\frac{\text{(LT in violation)}}{\text{(LT in operation)}} \times 100\% = \text{(must be less than 5\%)}$

LT = Length of time

8. Data acquisition shortfall/monitor down time:

If the total monitor downtime is over 5% of the total time, the Air Engineering Section will be notify the Air Inspections and Enforcement Section with a memorandum.

Formula: $\frac{\text{(LT of Data Inadequacy)}}{\text{(LT of operation)}} \times 100\% = \text{(less than 5\%)}$

LT = Length of time

Note: Quality Assurance/Quality Calibration time is not to be included in monitor downtime.

9. Stack Tests/Relative Accuracy Test Audits:

All CEM systems are required to be stack tested after initial installation. Some CEM systems are required to perform Relative Accuracy Test Audits once a year to insure that the monitor(s) are working properly. If the source fails to perform any of the required tests the Air Engineering Section will notify the Air Inspections and Enforcement Section with a memorandum.